

EXHIBIT J

STATE OF NEW YORK
OFFICE OF ATTORNEY GENERAL

In re:

FINANCIAL STATEMENTS INVESTIGATION

October 5, 2020

9:35 a.m.

VIDEOCONFERENCE EXAMINATION

UNDER OATH of ERIC F. TRUMP, held at 725
Fifth Avenue, New York, New York, before
Wayne Hock, a Notary Public of the State
of New York.

A P P E A R A N C E S:

STATE OF NEW YORK
OFFICE OF ATTORNEY GENERAL
28 Liberty Street
New York, New York 10005

BY: MATTHEW COLANGELO, ESQ.
(via videoconference)
ERIC R. HAREN, ESQ.
(via videoconference)
LOUIS M. SOLOMON, ESQ.
(via videoconference)
COLLEEN K. FAHERTY, ESQ.
(via videoconference)
AUSTIN THOMPSON, ESQ.
(via videoconference)
GARY FISHMAN, ESQ.
(via videoconference)
ALEX FINKELSTEIN, ESQ.
(via videoconference)
KEVIN WALLACE, ESQ.
(via videoconference)

THE LAW OFFICES OF ALAN S. FUTERFAS
565 Fifth Avenue
New York, New York 10017

BY: ALAN S. FUTERFAS, ESQ.
(via videoconference)
-and-

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A P P E A R A N C E S: (Continued)

MUKASEY FRENCHMAN & SKLAROFF LLP
Attorneys for Witness

2 Grand Central Tower
140 East 45th Street
New York, New York 10017

BY: MARC L. MUKASEY, ESQ.
(via videoconference)

ALSO PRESENT:

SHAWN BUDD, Videographer
(via videoconference)

* * *

1
2 THE VIDEOGRAPHER: We are on the
3 record.

4 This is the videographer
5 speaking, Shawn Budd, with Veritext
6 Legal Solutions.

7 Today's date is October 4, 2020
8 [sic] and the time is 9:35 a.m.

9 We are here to take the remote
10 video deposition of Eric Trump in the
11 matter of Financial Statements
12 Investigation.

13 Will counsel please introduce
14 themselves for the record.

15 MR. COLANGELO: This is Matthew
16 Colangelo from the New York Attorney
17 General's office.

18 And just one correction to the
19 record, Mr. Budd, I believe you said
20 today was October 4. Today is the 5th
21 of October.

22 THE VIDEOGRAPHER: My apologies,
23 yes.

24 MR. COLANGELO: Also attending
25 this morning from the Attorney

1
2 General's office are Colleen Faherty,
3 Austin Thompson, Alex Finkelstein,
4 Eric Haren, Gary Fishman, Kevin
5 Wallace, and Lou Solomon.

6 And before we swear the witness,
7 let's have Mr. Trump's counsel
8 introduce themselves as well.

9 MR. FUTERFAS: Good morning, Alan
10 Futerfas for Mr. Trump.

11 Marc, you wanted to say hello?

12 MR. MUKASEY: Sure.

13 Good morning, Marc Mukasey of
14 Mukasey Frenchman and Sklaroff also
15 for Eric Trump.

16 And Matthew, let me ask, are all
17 the folks you just named employees of
18 the Attorney General's office and
19 lawyers on this case or do they have
20 different positions? And is anybody
21 who's not employed by your office on
22 the phone?

23 MR. COLANGELO: Nobody not
24 employed by any office is on the
25 phone. Everybody I introduced is an

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attorney with the Attorney General's
office working on this matter.

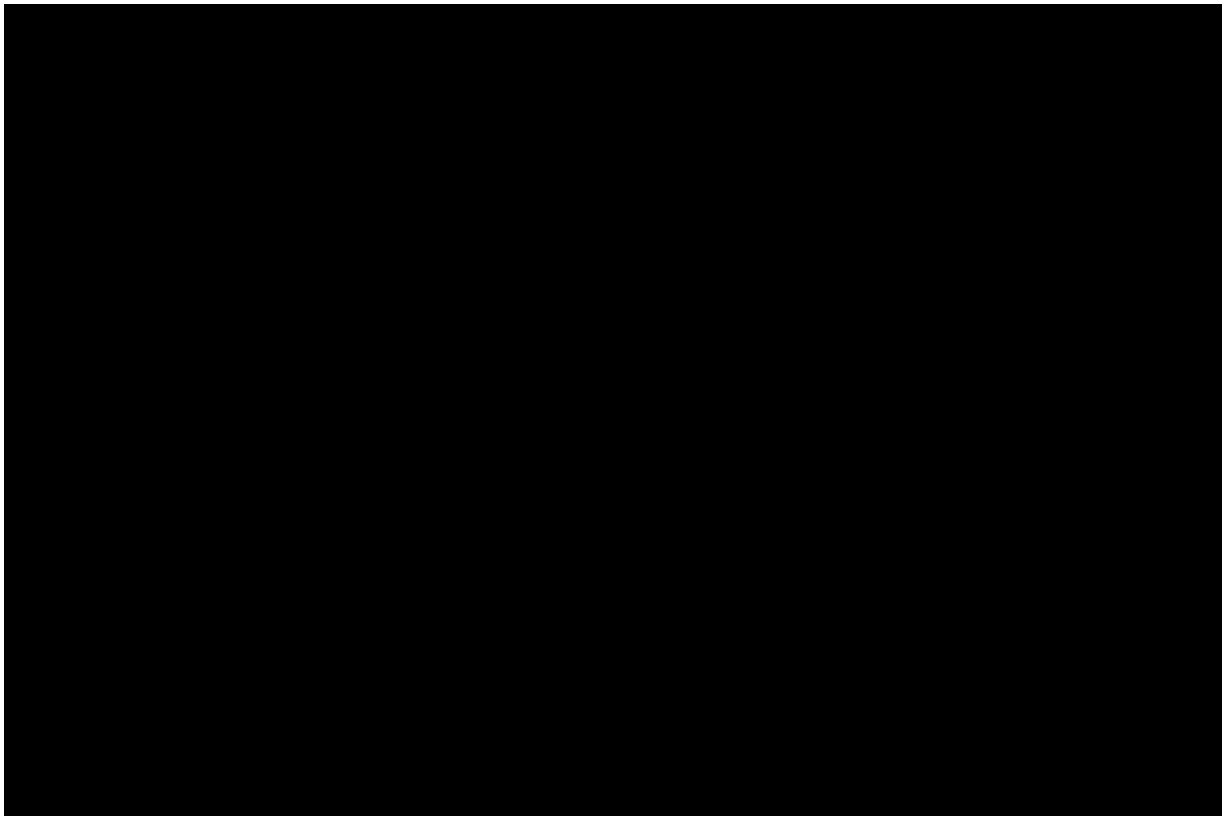
MR. MUKASEY: Thank you.

MR. COLANGELO: Wayne, can you
swear the witness.

E R I C F. T R U M P, having
been first duly sworn by a
Notary Public of the State of
New York, upon being examined,
testified as follows:

EXAMINATION BY

MR. COLANGELO:



1 E. Trump

2 A. Yes.

3 Q. So did you start working at The
4 Trump Corporation immediately after
5 graduating from college?

6 A. Virtually, yes.

7 Q. And can you tell me what --

8 MR. COLANGELO: Withdrawn.

9 Q. You just said that you work for
10 The Trump Corporation.

11 Can you tell me what The Trump
12 Organization is?

13 A. I will let somebody who's much
14 better at answering entity questions
15 answer that than me, meaning structural
16 ownership questions. I would let somebody
17 else handle that. They'd do a much better
18 job than I would.

19 Q. Okay.

20 What's your understanding of The
21 Trump Organization?

22 MR. FUTERFAS: I think Mr. Trump
23 will respond to the question with an
24 assertion of rights from here on
25 forward.

1 E. Trump

2 Mr. Trump, if you'd like to
3 assert your -- he will read an
4 assertion of rights at this point.

5 THE WITNESS: The Attorney
6 General of the State of New York has
7 abandoned fairness, justice,
8 impartiality when it comes to my
9 family and to our business. Before
10 Letitia James even took office, she
11 publicly stated that she already
12 concluded that The Trump Organization
13 engaged in wrongdoing and that she was
14 going to use the power of her office
15 to investigate our company, target my
16 family, and go after my father, the
17 President of the United States. She
18 said that, if elected, she would use
19 her office to look into every aspect
20 of my father's real estate deals. She
21 swore that she would definitely sue
22 him. She claimed that he was an
23 illegitimate president more times than
24 I can count. She boasted on video
25 that she would be, and I quote, "a

1 E. Trump

2 real pain in the ass." And she
3 declared, "just wait until I'm in the
4 Attorney General's office. I've got
5 my eyes on Trump Tower." In perhaps
6 her most egregious statement while
7 campaigning she said, "we must join
8 with law enforcement and other
9 attorney generals across this nation
10 in removing this President from
11 office. It's important that everyone
12 understand that the days of Donald
13 Trump are coming to an end."

14 Q. Mr. Trump, my question was
15 what's your understanding what The Trump
16 Organization is.

17 MR. FUTERFAS: And he's
18 responding to the question with an
19 assertion of rights which he will
20 make.

21 Please continue reading your
22 assertion and your response.

23 MR. COLANGELO: Hang on one
24 second.

25 Mr. Futerfas, I'm trying to

1 E. Trump
2 conduct this examination as
3 expeditiously as we can out of respect
4 for the witness and the court reporter
5 and the videographer and all the
6 attorneys. My question was simply:
7 What's your understanding of what The
8 Trump Organization is.

9 MR. MUKASEY: And Matthew, if
10 you're just a little patient, he is
11 going to assert his rights under the
12 United States Constitution. Just bear
13 with us. We want this to go as
14 expeditiously as possible as well.
15 Let him make his response and assert
16 his rights.

17 Thank you.

18 Q. Go ahead, Mr. Trump.

19 A. I'd like to start again if I'm
20 going to be interrupted.

21 Q. Mr. Trump, I'm not going to have
22 my time and all my colleagues' time
23 wasted. You've already made part of your
24 statement on the record. Why don't you
25 proceed.

1 E. Trump

2 A. Thank you.

3 Letitia James made those
4 statements without a shred of evidence,
5 all while using them to fundraise and
6 solicit financial support for her
7 campaign.

8 After the Attorney General was
9 elected, she followed through on these
10 promises, publicly stating that she'd use
11 every area of the law to investigate
12 President Trump, his business
13 transactions, and that of his family.
14 Almost immediately she launched what is
15 now an eighteen-month long fishing
16 expedition wasting tens of thousands of
17 hours and millions of taxpayer dollars.
18 She blatantly took an adversarial
19 political position leading the endorsement
20 of Attorney Generals for Joe Biden and
21 conveniently chose the first day of the
22 Republican National Conventions, moments
23 before my family was set to take the
24 stage, as an appropriate time to file a
25 lawsuit against our company.

1 E. Trump

2 The Attorney General has
3 continued to make public statements and
4 pronouncements that reflect clear bias,
5 and this conduct for an elected official
6 who's supposed to act without prejudice or
7 favor is unlawful, it's unethical, and
8 it's grossly improper.

9 As we sit here today less than a
10 month away from the United States
11 presidential election and with my father
12 in Walter Reed Hospital, it has never been
13 more clear that Letitia James has
14 weaponized her office to target my father
15 and influence the upcoming election.

16 The Attorney General's known
17 politicization of her duties and
18 responsibilities as an elected official
19 violate every known rule of ethics,
20 impartiality, and justice. She has a
21 politically-motivated vendetta against my
22 father and our family, and her actions
23 blatantly my due process rights as well as
24 the oath that she swore to uphold.

25 After seeing Letitia James'

1 E. Trump

2 videos and statements, the Attorney
3 General of the State of Louisiana, Jeff
4 Landry, stated, "this is what" --

5 Q. Mr. Trump, I'm sorry, but this
6 answer is not responsive. If you have an
7 assertion of rights, please make your
8 assertion of rights. I can't spend the
9 entire day with this sort of obstreperous
10 answer. If you have an assertion of
11 rights, please make your assertion of
12 rights, but the answer you've been giving
13 so far is not responsive to my question.

14 MR. FUTERFAS: He'll have an
15 assertion of rights in ninety seconds.

16 Q. Go ahead.

17 A. After Letitia James' videos and
18 statements, Attorney General of Louisiana,
19 Jeff Landry, stated, "this is what an
20 abuse of prosecutorial discretion looks
21 like. No prosecutor should run on a
22 platform of threatening an American
23 citizen, his family, and his private
24 business with investigations and lawsuits,
25 all for political gain." The United

1 E. Trump

2 States Supreme Court has stated that
3 prosecutors are prohibited from engaging
4 in arbitrary fishing expeditions,
5 initiating investigations out of malice or
6 an intent to harass, or using the power to
7 try and interfere with a President's
8 official duties.

9 Furthermore, the Supreme Court
10 has made it very clear that any effort to
11 manipulate a President's policy decisions
12 or retaliate against a President for
13 official acts through the issuance of a
14 subpoena is unconstitutional.

15 Years ago the Supreme Court
16 ruled that one of the Fifth Amendment's
17 basic functions is to protect innocent
18 individuals. Given the circumstances, it
19 is clear that the Attorney General is not
20 proceeding impartially and is not
21 proceeding without bias or favor. She's
22 carrying out a deliberate biased political
23 agenda that she promised as a candidate in
24 order to hurt my family and to help the
25 opposing political party. This is a

1 E. Trump

2 fundamental violation of due process. It
3 is a fundamental violation of my rights as
4 a citizen.

5 Accordingly, under the direction
6 of my counsel and for all of the above
7 reasons, I respectfully decline to answer
8 the questions under the rights of
9 privileges afforded to every citizen under
10 the United States Constitution and all
11 parts thereof and thereto including, but
12 not limited, to the separation of powers
13 doctrine, the First Amendment, the Fourth
14 Amendment, the Fifth Amendment, the Sixth
15 Amendment, and the Fourteenth Amendment as
16 incorporated through the Fifth Amendment
17 due process clause.

18 This will be my answer to all
19 further statements.

20 Q. Mr. Trump, when you joined The
21 Trump Corporation, what was your title?

22 A. For all the reasons provided in
23 my answer which are incorporated herein in
24 its entirety, I decline to answer that
25 question.

1 E. Trump

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 Q. Do you have any reason to think

6 that Mr. McConney would have recorded a

7 telephone conversation with you that

8 didn't, in fact, happen?

9 A. For all the reasons provided in

10 my answer, which is incorporated herein in

11 its entirety, I decline to answer the

12 question.

13 Q. Did you tell Mr. McConney in

14 September, 2012 that New Castle was lands

15 to be donated?

16 A. For all the reasons provided in

17 my answer, which is incorporated herein in

18 its entirety, I decline to answer the

19 question.

20 Q. Had you, in fact, made a

21 decision that the New Castle portion of

22 the Seven Springs Estate was to be donated

23 by September 24, 2012?

24 A. For all the reasons provided in

25 my answer, which is incorporated herein in

1 E. Trump

2 its entirety, I decline to answer the
3 question.

4 Q. Did you tell Mr. McConney in
5 September, 2012 that the North Castle land
6 was to be used as part of the main
7 mansion?

8 A. For all the reasons provided in
9 my answer, which is incorporated herein in
10 its entirety, I decline to answer the
11 question.

12 Q. And the main mansion in North
13 Castle is the Meyer Mansion or Meyer
14 House; right?

15 A. For all the reasons provided in
16 my answer, which is incorporated herein in
17 its entirety, I decline to answer the
18 question.

19 Q. Was any decision to donate the
20 New Castle land that was made in 2012 a
21 change from the prior year's plans?

22 A. For all the reasons provided in
23 my answer, which is incorporated herein in
24 its entirety, I decline to answer the
25 question.

CERTIFICATION BY REPORTER

I, Wayne Hock, a Notary Public of the State of New York, do hereby certify:

That the testimony in the within proceeding was held before me at the aforesaid time and place;

That said witness was duly sworn before the commencement of the testimony, and that the testimony was taken stenographically by me, then transcribed under my supervision, and that the within transcript is a true record of the testimony of said witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, that I am not interested directly or indirectly in the matter in controversy, nor am I in the employ of any of the counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 6th day of October, 2020.

Wayne Hock